

IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF ILLINOIS
EASTERN DIVISION

LAURIE PITLOCK and LUCILLE
PITLOCK,

Plaintiffs,

v.

CORA BEEM, CHIEF OF SAUK
VILLAGE POLICE DEPARTMENT and
VILLAGE OF SAUK VILLAGE,
Defendants.

02C 5693

JUDGE ZAGEL

Trial By Jury Demanded

DOCKETED

AUG 12 2002

MAGISTRATE JUDGE KENDS

COMPLAINT

The Plaintiffs, LAURIE AND LUCILLE PITLOCK, by their attorney, MITCHELL A. KLINE, for a cause of action against Defendants, Cora Beem, Chief of Sauk Village Police Department [hereinafter Beem] and Village of Sauk Village [hereinafter Village] alleges as follows:

VIOLATION OF CIVIL RIGHTS

This is an action for violation of Plaintiffs' civil rights under 42 U.S.C. §1983 to redress and seeks damages.

THE PARTIES

1. Plaintiff, Laurie Pitlock, is a female citizen and resident of the State of Illinois residing in Sauk Village in the County of Cook.

2. Plaintiff, Lucille Pitlock, is a female citizen and resident of the State of Illinois residing in Sauk Village in the County of Cook.

3. Defendant, Beem, is the Chief of the Sauk Village Police Department and worked in Sauk Village in the County of Cook.

4. Defendant, Village, is a village providing services to its residents ,and at

U.S. DISTRICT COURT
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all times relevant herein defendant had a substantial physical and corporate presence within this Judicial District, at Sauk Village, Illinois. Defendant is an employer within the meaning of 42 U.S.C. §2000e(b) and employs more than 100 people.

JURISDICTION AND VENUE

5. This Court has jurisdiction pursuant to 28 U.S.C. §§1331,1343(a) and 1343(a)(4).

6. Venue is proper in this Court pursuant to 28 U.S.C. §1391(b).

7. Plaintiff has fulfilled all administrative prerequisites for the bringing of this lawsuit.

FACTS

8. Plaintiffs lived together in a home located at 2913 E. 223rd Place in Sauk Village, Illinois on August 10, 2000.

9. On August 10, 2000, at approximately 10:00 p.m. the Plaintiffs' back door was forced open by several people.

10. The people who invaded the Pitlocks' home never identified themselves as police officers or showed police badges.

11. The Plaintiffs did not learn the identity of the intruders until they heard the message received by the officers approximately five minutes after the intrusion, which stated that the officers were in the wrong house.

12. Ms. Lucille Pitlock, who is over seventy years old and a diabetic, was very upset and shaking after the invasion; her sugar level experienced a dramatic increase; Ms. Pitlock was prescribed tranquilizers, which she used for approximately four days.

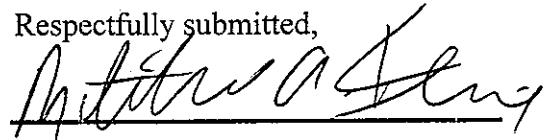
13. Ms. Laura Pitlock who is Lucille's daughter, experienced nightmares after the invasion, which caused her to jump out of bed for approximately two weeks after the intrusion; Laura had difficulty sleeping for at least two months after the invasion.

14. As a result of Defendants' unlawful, unconstitutional conduct, which violated the civil rights of Plaintiffs, Plaintiffs have suffered severe emotional distress.

WHEREFORE, Plaintiffs requests that this Court:

- (a) declare that Defendants violated the civil rights of Plaintiffs;
- (b) award Plaintiffs pecuniary damages in an amount to compensate them for all damage suffered by virtue of Defendants violation of their rights;
- (c) award Plaintiffs compensatory and punitive damages in an appropriate amount;
- (d) award Plaintiff prejudgment interest on damages recovered, at the prime rate, compounded annually, or the rate allowed by law; and
- (e) award costs, reasonable attorney's fees, and such other relief as it deems just.

Respectfully submitted,



Mitchell A. Kline
Attorney for Plaintiffs

Mitchell A. Kline
Law Office of Mitchell A. Kline
203 N. LaSalle Street
Suite 2100
Chicago, Illinois 60601
(312) 558-1454

UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF ILLINOIS

Civil Cover Sheet Input Form

02C 5693

JUDGE ZAGEL

This form has been approved for use by the general public for generating the civil cover sheet for filing new cases in the Northern District of Illinois. Your comments about the form and suggestions for improvements are always greatly appreciated.

DOCKETED

AUG 1 2002
MAGISTRATE JUDGE KEYS

This automated JS-44 conforms generally to manual JS-44 approved by the Judicial Conference of the United States in September 1974. The data is required for the use of the Clerk of Court for the purpose of initiating the civil docket sheet. The information contained herein neither replaces nor supplements the filing and service of pleadings or other papers as required by law. This form is authorized for use only in the Northern District of Illinois. (Instructions)

I (a) - PLAINTIFFS	DEFENDANTS
Laurie Pitlock Lucille Pitlock	Cora Beem, Chief of Police Village of Sauk Village
b) - County of Residence of First Listed Plaintiff (Except in U.S. Plaintiff Cases) Cook	County of Residence of First Listed Defendant (In U.S. Plaintiff Cases Only) Cook
Plaintiff's Attorney	Defendant's Attorney (If known)
Name: Mitchell A. Kline Firm: Law Office of Mitchell A. Kline Address: 203 N.LaSalle , 2100 Chgo., IL 60601 Phone: 312 558-1454	Name: Firm: Address: Phone:

II. Basis of Jurisdiction

(Select from drop menu below)

3. Federal Question (U.S. not a party) ▼

III. Citizenship of Principal Parties (Diversity cases only)

PLAINTIFF

N/A

DEFENDANT

N/A

IV. Origin

(Select from drop menu below)

1. Original Proceeding ▼

V. Nature of Suit (Select one box)**Contract**

- 110 Insurance
- 120 Marine
- 130 Miller Act
- 140 Negotiable Instrument
- 150 Recovery of Overpayment & Enforcement of Judgment
- 151 Medicare Act
- 152 Student Loan -non VA
- 153 Recovery of VA Benefits
- 160 Stockholder Suits
- 190 Other Contract
- 195 Contract Product Liability

Real Property

- 210 Land Condemnation
- 220 Foreclosure
- 230 Rent Lease & Ejectment
- 240 Torts to Land
- 245 Tort Product Liability
- 290 Other Real Property

Bankruptcy

- 422 Appeal 28 USC 158
- 423 Withdrawal 28 USC 157

Property Rights

- 820 Copyrights
- 830 Patent
- 840 Trademark
- 610 Agriculture
- 620 Other Food & Drug
- 625 Drug Related Seizure of Property 21 USC 881
- 630 Liquor Laws
- 640 R.R. & Truck
- 650 Airline Regulations
- 660 Occupational Safety/Health
- 690 Other

Torts**Personal Injury**

- 310 Airplane
- 315 Airplane Product Liability
- 320 Assault, Libel & Slander
- 330 Federal Employers' Liability
- 340 Marine
- 345 Marine Product Liability
- 350 Motor Vehicle
- 355 Motor Vehicle Product Liability
- 360 Other Personal Injury
- 362 Med. Malpractice
- 365 Personal Injury - Product Liability
- 368 Asbestos Personal Injury Product Liability
- 370 Other Fraud
- 371 Truth in Lending
- 380 Other Pers Property Damage
- 385 Property Damage Product Liability

Civil Rights

- 441 Voting
- 442 Employment
- 443 Housing/Accomodations
- 444 Welfare
- 440 Other Civil Rights

Forfeiture/Penalty

- 510 Motions to Vacate Sentence
- Habeas Corpus:**
- 530 Habeas Corpus General
- 535 Habeas Death Penalty
- 540 Mandamus & Other
- 550 Civil Rights
- 555 Prison Condition

Labor

- 710 Fair Labor Standards Act
- 720 Labor/Mgmt. Relations
- 730 Labor/Mgmt. Reporting & Disclosure Act
- 740 Railway Labor Act
- 790 Other Labor Litigation
- 791 E.R.I.S.A.

Other Statutes

- 400 State Reapportionment
- 410 Antitrust
- 430 Banks & Banking
- 450 Commerce/ICC Rates/ etc
- 460 Deportation
- 470 RICO
- 810 Selective Service
- 850 Securities / Commodities / Exchange
- 875 Customer Challenge 12 USC 3410
- 891 Agricultural Acts
- 892 Economic Stabilization Act
- 893 Environmental Matters
- 894 Energy Allocation Act
- 895 Freedom of Information Act
- 900 Appeal of Fee Determination Under Equal Access to Justice
- 950 Constitutionality of State Statute
- 890 Other Statutory Actions

Social Security

- 861 HIA (1395ff)
- 862 Black Lung (923)
- 863 DIWC/DIWW (405(g))
- 864 SSID Title XVI
- 865 RSI (405(g))

Federal Tax Suits

- 870 Taxes US Plaintiff or Defendant
- 871 IRS Third Party 26 USC 7609

VI Cause of Action (CITE THE U. S. STATUTE UNDER WHICH YOU ARE FILING AND WRITE A BRIEF STATEMENT OF CAUSE. DO NOT CITE JURISDICTIONAL STATUTES UNLESS DIVERSITY.)

42 USC 1983

VII. Requested in Complaint	<input type="checkbox"/> Class Action Under FRCP 23 <input checked="" type="checkbox"/> Not Class Action	Demand [Redacted]	Jury Demand (requested in Complaint) <input checked="" type="checkbox"/> Yes <input type="checkbox"/> No
VIII. This Case	<input type="checkbox"/> is not a refiling of a previously dismissed action. <input type="checkbox"/> is a refiling of case number [Redacted], previously dismissed by Judge [Redacted]		

Generate JS-44

Reset Form

Melissa Kenj 8-9-02

NOTE: When the print dialogue box appears, be sure to uncheck the Annotations option.

In the Matter of

Laurie Pitlock and Lucille Pitlock

v.

Cora Beem, Chief of Sauk Village Police Department
and Village of Sauk Village

UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF ILLINOIS

Eastern Division

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Case Number

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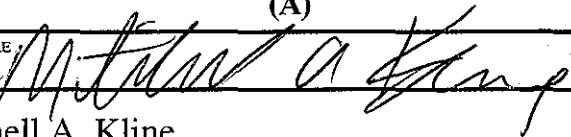
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APPEARANCES ARE HEREBY FILED BY THE UNDERSIGNED AS ATTORNEY(S) FOR:

Plaintiffs

JUDGE ZAGEL

MAGISTRATE JUDGE KEYS

(A)		(B)	
SIGNATURE 	SIGNATURE		
NAME Mitchell A. Kline	NAME		
FIRM Law Office of Mitchell A. Kline	FIRM		
STREET ADDRESS 203 N. LaSalle St. ste 2100	STREET ADDRESS		
CITY/STATE/ZIP Chgo., IL 60601	CITY/STATE/ZIP		
TELEPHONE NUMBER 312 558 1454	TELEPHONE NUMBER		
IDENTIFICATION NUMBER 3122669	IDENTIFICATION NUMBER		
MEMBER OF TRIAL BAR? YES <input checked="" type="checkbox"/> NO <input type="checkbox"/>	MEMBER OF TRIAL BAR? YES <input type="checkbox"/> NO <input type="checkbox"/>		
TRIAL ATTORNEY? YES <input checked="" type="checkbox"/> NO <input type="checkbox"/>	TRIAL ATTORNEY? YES <input type="checkbox"/> NO <input type="checkbox"/>		
		DESIGNATED AS LOCAL COUNSEL? YES <input type="checkbox"/> NO <input type="checkbox"/>	
(C)		(D)	
SIGNATURE	SIGNATURE		
NAME	NAME		
FIRM	FIRM		
STREET ADDRESS	STREET ADDRESS		
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TRIAL ATTORNEY? YES <input type="checkbox"/> NO <input type="checkbox"/>	TRIAL ATTORNEY? YES <input type="checkbox"/> NO <input type="checkbox"/>		
DESIGNATED AS LOCAL COUNSEL? YES <input type="checkbox"/> NO <input type="checkbox"/>	DESIGNATED AS LOCAL COUNSEL? YES <input type="checkbox"/> NO <input type="checkbox"/>		

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